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Subject: Stage 3 Disclosure - Project Zebra [WBDUK-AC.FID26896945]
Date: Wed, 25 Jul 2018 21:33:48 +0100
Importance: Normal
Attachments: _DOC_29052146(1)_Linklaters_advice.docx;
Project_Zebra_Consolidated_Report_Draft_Subject_to_Change_21_08_2014_18_....pdf;
151077627.msg
Inline-Images: image3600bf.PNG; imageb5b066.PNG; imagedaee8f.PNG

Tony, Simon

In 2014 and as part of the Mediation Scheme, Linklaters produced a piece of advice for Post Office on the complaints made by SPMRs about Horizon. A copy of this advice is attached. Linklaters recommended that Deloitte undertake a review of the integrity of Horizon – this review is known as Project Zebra and a copy of Deloitte's report is also attached.

Whilst Deloitte's report itself is covered by privilege and the Cs do not know of the existence of this report, we have come across an ancillary document which followed on from the report and discusses how to implement the findings within the business. This document falls within one of the Stage 3 Disclosure Classes and we are concerned that we are not able to assert privilege over this document (or privilege would be limited to those sections which refer to the Deloitte Report directly). I have attached the email chain but the document of interest is the Zebra Action Summary attached to the email.

We would welcome your thoughts on whether privilege can be asserted over the Zebra Action Summary, if parts of the document can be redacted for privilege or if the full document needs to be disclosed.

If you require any further information about the background to this document please let me know.

Kind regards

Amy

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m:
t:
e:

GRO

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